

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

BONNIE WHITE,	:	CIVIL ACTION No.
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
CROWN ASSET MANAGEMENT, LLC,	:	
	:	
Defendant.	:	

**DEFENDANT'S NOTICE OF REMOVAL**

TO THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA:

Defendant, Crown Asset Management (“Defendant”), pursuant to 28 U.S.C. §§ 1446(a), hereby gives notice that it is removing this action to the United States District Court for the Middle District of Pennsylvania, and as grounds therefore states as follows:

**NATURE OF THE ACTION**

1. Bonnie White (“Plaintiff”) commenced this action on or about January 22, 2021, by filing a Complaint in the Court of Common Pleas of Lackawanna County, Pennsylvania captioned as Bonnie White v. Crown Asset Management, LLC, Case No. 21-cv-304 (“Civil Action”).
2. Defendant was served with a copy of the Complaint on February 19, 2021.
3. The Complaint (the only filing in this matter) is attached hereto as Exhibit A.

**TIMELINESS OF REMOVAL**

4. This Notice of Removal is being filed within thirty (30) days of Defendant’s receipt of service of the Complaint. Therefore, removal of this case is timely pursuant to 28 U.S.C. § 1446(b).

## **BASIS FOR FEDERAL JURISDICTION**

5. Plaintiff alleges in her Complaint that Defendant violated certain provisions of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

6. Thus, removal to this Court is proper based on Federal Question Jurisdiction, 28 U.S.C. § 1331, as Plaintiff's claims arise under a federal statute.

7. All pleadings and other filings in the state court action are attached to this Notice as required by 28 U.S.C. § 1446(a). The filings consist of the above-described Exhibit A.

8. Venue is proper in this Court pursuant to 28 U.S.C. § 1446(a) because this district and division encompass Lackawanna County where the removed action was pending.

9. In accordance with 28 U.S.C. § 1446(d), Defendant has provided written notice of the filing of this Notice of Removal to Plaintiff, and has filed a copy with the Prothonotary of the Court of Common Pleas of Lackawanna County, Pennsylvania.

## **CONCLUSION AND PRAYER**

10. For the reasons set forth herein, Defendant respectfully prays this Court take jurisdiction of this action to its conclusion and final judgment, to the exclusion of any further proceedings in the Court of Common Pleas of Lackawanna County, Pennsylvania.

**WHEREFORE**, Defendant respectfully requests that this action be removed from the Court of Common Pleas of Lackawanna County, Pennsylvania to the United States District Court for the Middle District of Pennsylvania.

Dated: March 18, 2021

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI, LLP

*/s/ Jessica G. Lucas, Esquire*  
Jessica G. Lucas, Esquire  
*Counsel for Defendant*

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

BONNIE WHITE,	:	CIVIL ACTION No.
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
CROWN ASSET MANAGEMENT, LLC,	:	
	:	
Defendant.	:	

**CERTIFICATE OF SERVICE**

I hereby certify that on March 18, 2021, I electronically filed the foregoing NOTICE OF REMOVAL with the Clerk of Court using the CM/ECF system and have served the same by depositing a copy thereof in a postage prepaid envelope under the exclusive care and custody of the United States Post Office Department, properly addressed to Plaintiff's counsel, as follows:

Brett M. Freeman, Esq.  
Sabatini Freeman, LLC  
216 N. Blakely St.  
Dunmore, PA 18512  
[Brett@bankruptcypa.com](mailto:Brett@bankruptcypa.com)  
(Attorney for Plaintiff)

*/s/ Jessica G. Lucas, Esquire*

Jessica G. Lucas, Esquire  
GORDON REES SCULLY MANSUKHANI, LLP  
707 Grant Street, Suite 3800  
Pittsburgh, PA 15219  
(412) 577-7400  
PA ID No. 311280  
[jlcas@grsm.com](mailto:jlcas@grsm.com)  
*Counsel for Defendant*